

No. 22-13626

United States Court of Appeals for the Eleventh Circuit

HOUSTON COUNTY, GEORGIA, AND
HOUSTON COUNTY SHERIFF CULLEN TALTON, IN HIS OFFICIAL CAPACITY,
DEFENDANTS-APPELLANTS,

v.

ANNA LANGE,
PLAINTIFF-APPELLEE,

*APPEAL FROM THE U.S. DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA,
NO. 5:19-cv-392, HON. MARC T. TREADWELL, PRESIDING*

**MOTION FOR LEAVE TO FILE BRIEF OF CHRISTIAN EMPLOYERS
ALLIANCE AS *AMICUS CURIAE* SUPPORTING
APPELLANTS AND REVERSAL**

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Counsel for *Amicus Curiae*

SEPTEMBER 30, 2024

**CERTIFICATE OF INTERESTED PARTIES AND
CORPORATE DISCLOSURE STATEMENT**

Lange v. Houston County, Ga., No. 22-13626:

The undersigned counsel of record certifies that he is aware of no persons or entities not listed on prior filings who have an interest in the outcome of this case.

/s Christopher Mills
Christopher Mills

Counsel for *Amicus Curiae*

September 30, 2024

Proposed *amicus curiae* Christian Employers Alliance respectfully moves for leave to file the attached *amicus* brief supporting Defendants-Appellants and reversal in the en banc proceeding. Christian Employers Alliance is an alliance of Christian-owned businesses in the United States. CEA's mission as a ministry is to unite, equip, and represent Christian-owned businesses to protect religious freedom and provide the opportunity for employees, businesses, and communities to flourish. CEA members share a commitment to living out their Christian faith in everyday life. CEA provides advocacy on legal policy issues on behalf of its members. One of these issues is that male and female are immutable realities defined by biological sex. CEA recently obtained a permanent injunction against the EEOC from "interpreting or enforcing Title VII . . . or any implementing regulations thereto against CEA or its present or future members . . . in a manner that would require them to provide insurance coverage for gender-transition procedures in" their health plans. *Christian Employers Alliance v. EEOC*, No. 1:21-cv-195, 2024 WL 935591, at *11 (D.N.D. Mar. 4, 2024). Because the panel's logic mirrors the EEOC's, the CEA has a significant interest in this case.

Moreover, because of its long experience in this area, the CEA is particularly equipped to provide relevant arguments about the legal issues and the practical impact the Court's ruling will have. Its proposed brief explains how the panel's decision departs from binding precedents and flouts the logic of federal non-

discrimination laws. The brief also explains the severe consequences the panel's decision would have on employers.

For these reasons, the motion for leave to file an *amicus* brief should be granted.

Respectfully submitted,

s/ Christopher Mills

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CERTIFICATE OF COMPLIANCE

1. This document complies with the type-volume limit of Fed. R. App. P. 27(d)(2) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this motion contains 272 words.

2. This document complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word 365 in 14-point Times New Roman font.

3. This document has been scanned for viruses and is virus-free.

Dated: September 30, 2024

/s Christopher Mills
Christopher Mills

CERTIFICATE OF SERVICE

I, Christopher Mills, an attorney, certify that on this day the foregoing Motion was served electronically on all parties via CM/ECF.

Dated: September 30, 2024

s/ Christopher Mills
Christopher Mills